

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

TEXAS ASSOCIATION FOR MONEY SERVICES BUSINESSES (TAMSB); HIGH VALUE, INC.; REYNOSA CASA DE CAMBIO, INC.; NYDIA REGALADO d/b/a BEST RATE EXCHANGE; MARIO REGALADO d/b/a BORDER INTERNATIONAL SERVICES; LAREDO INSURANCE SERVICES, LLC; E.MEX. FINANCIAL SERVICES, INC.; R & C, INC. d/b/a TEMEX MONEY EXCHANGE; SAN ISIDRO MULTI SERVICES, INC.; CRIS WIN INC. d/b/a BROWNSVILLE CASA DE CAMBIO; ESPRO INVESTMENT LLC d/b/a LONESTAR MONEY EXCHANGE; and ARNOLDO GONZALEZ, Jr.,

*Plaintiffs,*

v.

PAM BONDI, Attorney General of the United States; SCOTT BESENT, Secretary of the Treasury; UNITED STATES DEPARTMENT OF THE TREASURY; ANDREA GACKI, Director of the Financial Crimes Enforcement Network; and FINANCIAL CRIMES ENFORCEMENT NETWORK,

*Defendants.*

Civil Case No. 5:25-cv-00344-FB

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**DECLARATION OF MIGUEL A. REGALADO  
PRINCIPLE OF BEST RATE EXCHANGE**

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I, Miguel A. Regalado, being of competent mind, declare as follows:

1. I am a United States citizen and a resident of Laredo, Texas. I am 59 years old.
2. I am the Principle of Best Rate Exchange a Sole Proprietorship which is a plaintiff

in the above-captioned civil action.

3. I manage the day-to-day operations of Best Rate Exchange. I have the authority to speak for Best Rate Exchange.

4. Best Rate Exchange is registered with the federal Financial Crimes Enforcement Network (“FinCEN”) as a Money Services Business (“MSB”) because it offers currency exchange services.

5. Because it offers those services in 78040 (2), 78041 (1) 78045 (1) 78852 (4), Best Rate Exchange is subject to FinCEN’s March 14, 2025, geographic targeting order (the “Border GTO”) requiring MSBs to file Currency Transaction Reports (“CTRs”) for cash transactions over \$200.

6. I estimate that at least 25% of the transactions that we process are for more than \$200 and would require a CTR under the Border GTO.

7. I know that a CTR is currently required for cash transactions of \$10,000 or more. Before the Border GTO came into effect, Best Rate Exchange filed an average of 5 CTR’s s month.

8. The Border GTO is going to radically increase the number of CTRs that we have to file. In a typical month, we do 6000 cash transactions over \$200 within the covered zip codes.

9. If transaction volume remains the same under Border GTO, filing all of those additional CTRs would take 2,000 hours of additional time. Our employees simply do not have time to fill out all that additional paperwork.

10. Under our current procedures, we collect the required recordkeeping information for those transactions above \$1000 , and it is given to the federal government when they collect our data base during their examinations or at their request.

11. We value our customers’ privacy, and when we collect information from our

customers we comply with all applicable privacy laws.

12. We also value the privacy of our business records, and we treat information about transactions at our business as proprietary business information.

13. We currently conduct some transactions over \$200 but below \$1,000 without collecting any information from our customers.

14. The Border GTO forces us to collect information on our customers that we would not otherwise collect and to report information to the federal government that we would not otherwise report.

15. Many customers will not want to provide their sensitive personal information every time they do legal, low-dollar, everyday transactions. And, since the Border GTO does not apply to every zip code, they can take their business to other businesses that are not affected.

16. The Border GTO will either drive away our customers or, if it does not, will impose massive and unsupportable compliance costs. Either way, the impact on our business will be catastrophic.

I declare under penalty of perjury that the foregoing is true and correct.

DATED and SIGNED this 18th day of April, 2025.

*/s/Miguel A Regalado*  
Miguel A Regalado